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FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D.C.

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Notice of Alternative Policy Options
for Managing Capacity at
LaGuardia Airport and Proposed
Extension of the Lottery Allocations

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Docket FAA-2001-9852 -19

**COMMENTS OF
SPIRIT AIRLINES, INC.**

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Representatives of
SPIRIT AIRLINES, INC.

Date: July 12, 2001

Notice of Alternative Policy Options for Managing Capacity at LaGuardia Airport and Proposed Extension of the Lottery Allocations

Given the unfortunate reality of severe operating constraints at LGA, Spirit supports the extension of the prevailing lottery arrangement until October 26, 2002, so that FAA can have adequate time to evaluate all of the possible alternatives. Spirit

strongly hopes that the FAA will continue to bear in mind the special problems of new-entrant airlines at LGA when considering these options. In addition, Spirit hopes that FAA also will explore various capacity expansion alternatives, even if they are not achievable in the short term.

Although access to slots has rightly been the FAA's primary focus, FAA should also be aware of other factors which might aggravate congestion at LGA. For its part, Spirit has been able to secure access only to a single gate at LGA. Reliance on a single gate means that Spirit (and carriers which are similarly situated) suffer especially severe service disruptions when it encounters ground delays at LGA. These delays often cause a cascade of delays throughout Spirit's system.

Spirit has taken numerous steps to adjust its schedules to mitigate the impact of delays at LGA. For example, flight times have been adjusted, and planned ground times have been lengthened to recognize the "new reality" at LGA. While these changes have improved Spirit's operations, Spirit would like to suggest an administrative remedy that might further alleviate protracted delays.

Certain flights and schedules are affected more significantly by ATC delays than others. For its part, Spirit has an LGA-DTW flight which continues on to LAX, whereafter the aircraft turns around overnight and returns to the East Coast. If that flight is delayed, then the impact is felt over at least two consecutive days. Every step possible has been taken to insulate that flight from delays. Thus, the LGA departure was moved from the 1600 hour to the 1500 hour to avoid the most congested periods; scheduled turn times at LGA have been increased to 65 minutes; the incoming flight comes from uncongested Fort Myers; and that flight (NK 890) is the aircraft's first flight

of the day, thus minimizing the risk of mechanical or other difficulties. Still a ground delay program which delays Flt 890 even 30 minutes negates all these measures, and causes virtually certain delays the next day. Spirit would urge that FAA's Air Traffic Management Branch to provide carriers with some mechanism to "prioritize" their flights, and provide them with a means to identify and "protect" some small number of flights which are most sensitive to delays.

Spirit is aware of the enormous difficulty of the task the FAA faces in managing capacity at LGA, and appreciates the steps taken thus far to preserve the operational viability of new entrants at LGA. The remedy Spirit proposes might be another positive step the FAA can take to mitigate the disruption and inconvenience caused by severe flight delays, and Spirit urges that it be given full consideration.

Respectfully submitted,



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